

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

TELCORDIA TECHNOLOGIES, INC.,)
Plaintiff,)
v.) Civil Action No. 04-876-GMS
CISCO SYSTEMS, INC.,)
Defendant.)

**PLAINTIFF TELCORDIA TECHNOLOGIES, INC.'S
OBJECTIONS TO DEFENDANT CISCO SYSTEMS, INC.'S
NOTICE OF DEPOSITION OF VERNON ANTHONY**

Plaintiff Telcordia Technologies, Inc. ("Telcordia"), by its attorneys, hereby objects to the Notice of Deposition of Vernon Anthony by defendant Cisco Systems, Inc. ("Cisco").

OBJECTIONS

1. Telcordia objects to the use, including use by other parties, of any testimony from the noticed deposition in separate cases, such as the pending suits against Alcatel and Lucent (Telcordia Technologies, Inc. v. Alcatel USA, Inc., Civil Action No. 04-874-GMS and Telcordia Technologies, Inc. v. Lucent Technologies, Inc., Civil Action No. 04-875-GMS).

2. Telcordia objects to the extent that this deposition in combination with depositions of other witnesses would cause Cisco to exceed any of the limits on depositions set forth in the Federal Rules of Civil Procedure.

3. Telcordia objects to the extent that this deposition seeks information that is protected by claims of attorney/client privilege or attorney work-product in light of the fact that Vernon Anthony, as part of his duties at Telcordia, maintains significant contacts with Telcordia's lawyers and is extensively exposed to confidential and privileged information.

ASHBY & GEDDES

/s/ Steven J. Balick

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Dated: May 16, 2006

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CERTIFICATE OF SERVICE

I hereby certify that on the 16th day of May, 2006, the attached **PLAINTIFF**
TELCORDIA TECHNOLOGIES, INC.'S OBJECTIONS TO DEFENDANT CISCO
SYSTEMS INC.'S NOTICE OF DEPOSITION OF VERNON ANTHONY was served upon
the below-named counsel of record at the address and in the manner indicated:

Jack B. Blumenfeld, Esquire
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HAND DELIVERY

Matthew D. Powers, Esquire
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VIA ELECTRONIC MAIL

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/s/ Steven J. Balick

Steven J. Balick